

Robert J. Nelson (CSB No. 132797)
rnelson@lchb.com
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415)956-1000
Facsimile: (415) 956-1008

Juli E. Farris (CSB No. 141716)
jfarris@kellerrohrback.com
KELLER ROHRBACK L.L.P.
801 Garden Street, Suite 301
Santa Barbara, CA 93101
Telephone: (805) 456-1496
Facsimile: (805) 456-1497

Class Counsel
*(additional counsel listed at
signature)*

A. Barry Cappello (CSB No. 037835)
abc@cappellonoel.com
Leila J. Noël (CSB No. 114307)
lnoel@cappellonoel.com
CAPPELLO & NOËL LLP
831 State Street
Santa Barbara, CA 93101-3227
Telephone: (805)564-2444
Facsimile: (805)965-5950

Lead Trial Counsel

HENRY WEISSMANN (State Bar No.
132418)
henry.weissmann@mto.com
LUIS LI (State Bar No. 156081)
Luis.li@mto.com
MARTIN ESTRADA (State Bar No. 223802)
Martin.estrada@mto.com
DANIEL B. LEVIN (State Bar No. 226044)
daniel.levin@mto.com
GRANT A. DAVIS-DENNY (State Bar No.
229335)
grant.davis-denny@mto.com
JORDAN X. NAVARRETTE (State Bar No.
306143)
jordan.navarrette@mto.com
COLIN A. DEVINE (State Bar No. 315801)
colin.devine@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, California 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

Attorneys for Defendants
PLAINS ALL AMERICAN PIPELINE, L.P.
and PLAINS PIPELINE, L.P.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KEITH ANDREWS, *et al.*, individually
and on behalf of others similarly
situated,

Plaintiffs,

vs.

PLAINS ALL AMERICAN PIPELINE,
L.P., a Delaware limited partnership,
and PLAINS PIPELINE, L.P., a Texas
limited partnership, and JOHN DOES 1
through 10,

Defendants.

Case No. 2:15-cv-04113-PSG-JEM

[Consolidated with Case Nos. 2:15-cv-
04573-PSG (JEMx), 2:15-cv-04759-
PSG (JEMx), 2:15-cv-04989-PSG
(JEMx), 2:15-cv-05118-PSG (JEMx),
2:15-cv-07051-PSG (JEMx)]

**AMENDED JOINT TRIAL
WITNESS LIST**

Judge: Hon. Philip S. Gutierrez
Trial Date: TBD
Pretrial Conference: TBD

Class Plaintiffs and the Plains Defendants (“the Parties”) hereby submit the following witness list indicating those witnesses whom they expect to call at trial or may call if need arises, either in person or by deposition. Many of the witnesses listed below have previously submitted declarations and/or testified in deposition or in a prior matter, and their testimony at trial may include the matters covered in such declarations or testimony.

Each Party reserves the right not to call or present testimony from any particular witness. By identifying witnesses below, the Party does not agree to make a witness available for trial. The order in which the witnesses are listed is not necessarily the order in which witnesses will be called at trial. Each Party reserves the right to call witnesses identified by the other Party. The below list does not necessarily include all of those witnesses whom the Parties may call at trial for impeachment or rebuttal. Each Party reserves the right to amend all time estimates.

PLAINTIFFS EXPECT TO PRESENT

* Indicates that witness will be call only if need arises

Witness Name	Description and Time Estimate
Sherri Adkins	Records Custodian, Plains. Ms. Adkins’ designated testimony describes Plains’ lack of documentation of integrity management procedures. Estimated time (direct): 0.5 hour
Cassandra Alexander a/k/a Cassandra Hickey	Associate Integrity Specialist, Plains. Ms. Alexander is Plains’ Integrity Management employee who reviewed ILI reports and determined which anomalies needed repairs. Ms. Alexander will testify about interpretation of ILI reports, calibration using data from prior digs, and reporting field measurements back to Rosen. Estimated time (direct): 0.5 hour

1	Keith Andrews	Subclass Representative, Fishers. Mr. Andrews is a sea cucumber fisher and Subclass Representative who will testify about the harm caused by Plains' Oil Spill. Keith and Tiffani Andrews are the only sea cucumber fisher Subclass Representatives.
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5		Estimated time (direct): 0.5 hour
6	Tiffani Andrews	Subclass, Representative, Fishers. Ms. Andrews is a sea cucumber fisher and Subclass Representative who will testify about the harm caused by Plains' Oil Spill. Keith and Tiffani Andrews are the only sea cucumber fisher Subclass Representatives.
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10		Estimated time (direct): *
11	Greg Armstrong	Former CEO of Plains. Mr. Armstrong was CEO at the time of the May 19, 2015 Oil Spill and was ultimately responsible for the conduct of the Plains' organization leading up to, during and after the Oil Spill. Mr. Armstrong he will also have knowledge of Plains' financial condition for purposes of assessing punitive damages.
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15		Estimated time (direct): *
16	Elsa Arndt	Deputy Director of the Office of Emergency Mgmt. (Ret.) Ms. Arndt will testify regarding emergency response drills in which Plains participated, including a drill on the day of the Spill, and provides a first-hand account as a witness to the Spill. Ms. Arndt has first-hand knowledge of the Spill and its immediate aftermath, particularly in her role coordinating the clean-up.
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21		Estimated time (direct): 0.5 hour
22	Arnulfo Baez	Santa Barbara, Uni, Subclass Representative. Mr. Baez is the owner of a sea urchin processing business who will testify about the harm caused by Plains' Oil Spill. Mr. Baez is the only sea urchin processor serving as a Subclass Representative.
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26		Estimated time (direct) 0.5 hour

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1	Dr. Randall Bell	Real Estate Economist and Expert. Mr. Randall Bell, PhD, MAI is a real estate economist and licensed appraiser who will opine on the loss of use of the beach amenity suffered by the Residential Real Property Subclass and also on the mass appraisal he performed by which he calculated class-wide damages. Dr. Bell is Plaintiffs' sole expert on loss of use suffered by the class and the value of the loss of use.
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6		Estimated time (direct): 3 hours
7	Chris Brand	Plaintiffs' Spill Volume Expert. Mr. Brand is a mechanical engineer who examines the volume of oil spilled on the basis of a metallurgical analysis of the failure location, an analysis of 15,000 barrels of missing oil identified by Plains, and an analysis of the valves on Plains' pipeline system.
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11		Estimated time (direct): 2 hours
12	Joshua Bremner	Pipeline Integrity Specialist, Plains. Mr. Bremner is Plains' Integrity Management department employee who invoked the 5th Amendment during his deposition and whose testimony Plaintiffs will use to support the inference the jury may draw regarding Plains' integrity management practices prior to the Spill and which led to their criminal conviction. Mr. Bremner is the only Plains' employee at his level, who reported to Plains' integrity department manager Robin Cunningham.
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18		Estimated time (direct): 0.5 hour
19	James Buchanan	Regulatory Compliance, Plains. Mr. Buchanan was involved in coordinating dig permits with the County of Santa Barbara and also the person at Plains tasked with the responsibility for reporting to relevant authorities in the event of an oil spill. Buchanan has unique knowledge of relevant permitting issues and Plains' response to the Oil Spill.
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23		Estimated time (direct): 1 hour
24	Katherine Buckingham	Principal Engineer, DNV GL. Ms. Buckingham is the sole fact witness from DNV, GL, which conducted the Root Cause Failure Analysis Report for Line 901 provided to PHMSA and Plains.
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27		Estimated time (direct): *

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1	Mike Buttram	Technician, Santa Maria Office, Plains. Mr. Buttram will testify regarding relevant compliance reporting, training, preparedness and response to the Oil Spill. Mr. Buttram is one of two Plains' operations employees who was on scene at the time of the Oil Spill and who has knowledge of local level operations issues.
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5		Estimated time (direct): 0.5 hour
6	Steven Caddell	Operations Manager, Western Division, Plains. Mr. Caddell had managerial responsibility of Plains' operations group responsible for Lines 901 and 903. Mr. Caddell was involved in Plains' Spill volume estimates and had awareness that the number of anomalies were increasing.
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10		Estimated time (direct): *
11	Kimberly Cameron Ph.D.	Expert on Pipeline Integrity. Ms. Kim Cameron, PhD, is Plaintiffs' sole expert on pipeline integrity and control room procedures. She will testify regarding Plains' errors, omissions, and reckless conduct in maintaining, inspecting, and repairing Line 901; performing the necessary engineering analyses to understand the risks on the pipeline; failing to identify and repair the failure anomaly prior to the spill; and failing to recognize and react to the spill in a reasonably prompt manner.
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17		Estimated time (direct): 4 hours
18	Christian Carcamo	Mr. Carcamo is the sole witness from Rosen USA, which provided inline inspection services for Line 901. Mr. Carcamo will testify about Rosen USA's provision of "smart pig," or inline inspections, to detect corrosion on Plains' pipelines.
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22		Estimated time (direct): 1 hour
23	Morgan Castagnola	Subclass Representative, Fishers. Mr. Castagnola is a fourth-generation Santa Barbara fisher and Subclass Representative who fishes for prawn and other species who will testify about the harm caused by Plains' Oil Spill. Mr. Castagnola fishes for a mix of species different than the other Subclass Representatives.
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27		Estimated time (direct): 0.5 hour
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1 2 3 4 5	Cptn. Chris Childers	SB County Fire Chief. Cptn. Childers will testify regarding the investigation of and response to Plains' Oil Spill. Cptn. Childers was one of the first responders who discovered the Spill and interacted with Plains' employees; and took videos of the Oil Spill. Estimated time (direct): *
6 7 8 9	Henry Cordova	Corrosion Supervisor / Integrity Specialist, Plains. Mr. Cordova will testify regarding Plains' assessment of corrosion on Lines 901 and 903 and has unique knowledge of corrosion issues and concerns on Lines 901 and 903. Estimated time (direct): 2 hours
10 11 12 13 14 15	Robin Cunningham	Pipeline Integrity Manager, Plains. Ms. Cunningham will testify regarding Plains' Integrity Management Plan and her department's efforts to comply with the integrity management plan. Ms. Cunningham has unique knowledge of Plains' integrity management practices and was the manager responsible for the department's Western US operations at the time of the Oil Spill. Estimated time (direct): 2.5 hours
16 17 18 19	Custodian of Records	California Department of Fish & Wildlife. A custodian of records from CDFW may authenticate photos, documents, and landing records provided in discovery. This witness would testify solely to authenticate exhibits. Estimated time (direct): *
20 21 22 23	Jerry De La Mora	Air Conditioning Technician. Mr. De La Mora will offer testimony regarding the 911 call he placed when he smelled oil. Mr. De La Mora was the first person to call 911 to report what later became clear was an oil spill. Estimated time (direct): 0.25 hour
24 25 26 27 28	Eric Each	Control Center Manager, Plains. Mr. Each is the control room manager who was responsible for the control room training, its management plan, implementing the alarm management plan, and the internal investigation about what went on in the control room on the day of the Spill. Estimated time (direct): 1 hour

1	R. Don Deaver	Pipeline operations expert. Mr. Deaver will testify, if 2 necessary, to provide expert opinion testimony about pipeline 3 maintenance and operational issues. 4 Estimated time (direct): *
5	Dr. Lorne Everett	Oil Transport Expert. Dr. Everett is an expert qualified in 6 land-based spill remediation, who will be called, if necessary, 7 to rebut Plains' expert testimony of Paul Boehm regarding the 8 amount of oil captured on land after pouring from Plains' 9 pipeline toward the ocean. 10 Estimated time (direct): *
11	Stephen Falgoust	Director of Asset Integrity, Plains. Mr. Falgoust oversaw the 12 Integrity Group and will testify regarding Plains' policies 13 regarding integrity management. Mr. Falgoust will testify 14 regarding the oversight of subordinate employees, applicable 15 policies requiring reporting feedback of dig results to Rosen 16 and integrity issues generally. 17 Estimated time (direct): 0.5 hour
18	Mike Gandall	Subclass Representative. Mr. Gandall is a lobster and crab 19 fisher and Subclass Representative who will testify about the 20 harm caused by Plains' Oil Spill. Mr. Gandall is the only 21 Subclass Representative who fishes primarily for California 22 spiny lobster. 23 Estimated time (direct): 0.5 hour
24	Alex Geremia	Beachfront Property Owner, Subclass Representative. Ms. 25 Geremia is a property owner and Subclass Representative who 26 will testify about the harm caused by Plains' Oil Spill. Ms. 27 Geremia has unique knowledge of the Oil Spill and response 28 near her ocean front property. Estimated time (direct): 0.5 hour

1	Ngiabi Gicuhi	Environmental Response, Plains. Mr. Gicuhi is the sole witness from Plains' Environmental and Regulatory Compliance department who will testify regarding the department's role on preventing oil spills and monitoring regulatory compliance. Mr. Gicuhi was involved with PHMSA's pre-spill audit of Line 901.
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5		Estimated time (direct): 0.5 hour
6	Mark Gorman	Executive VP Operations, Engineering, and Commercial, Plains. Mr. Gorman was the executive vice president who oversaw the Engineering Departments at Plains, and is knowledgeable regarding leadership's oversight of Plains' integrity management efforts.
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10		Estimated time (direct): 0.5 hour
11	Pete Guglielmo	Representative of Southern Cal Seafood, Inc. and Pacific Rim Fisheries, Inc. Subclass Representative. Mr. Guglielmo is the owner of class representatives Southern Cal Seafood, Inc. and Pacific Rim Fisheries, Inc. and will testify about the harm caused by Plains' Oil Spill.
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15		Estimated time (direct): 0.5 hour
16	Jacques Habra	Beachfront Property Owner, Subclass Representative. Mr. Habra is a property owner and class representative who will testify about the harm caused by Plains' Oil Spill.
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19		Estimated time (direct): 0.5 hour
20	Charles Hammond	Electrical Technician, Plains. Mr. Hammond was personally present at Sisquoc pump station and has unique knowledge of the events leading to the Spill.
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22		Estimated time (direct): *
23	Richard Hartig	Operations, Plains. Mr. Hartig is the Assistant Division Manager for the Operations Group and will testify regarding the interactions between the Operations Group and other groups, and regarding the integrity management policies in place leading up to the Spill.
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27		Estimated time (direct): 1 hour

1 2 3 4 5	Prof. Arturo Keller Ph.D.	Oil Sampling Expert. Prof. Keller is Plaintiffs' sole expert focused on the issue of fingerprinting and will testify regarding the matters in his expert reports, including the scope of Plains' Oil Spill as determined by fingerprinting, fingerprinting techniques, and post-spill sampling. Estimated time (direct): 1 hour
6 7 8	Mary Kirkhart	Beachfront Property Renter, Subclass Representative. Ms. Kirkhart will testify about the harm caused by Plains' Oil Spill. Estimated time (direct): 0.5 hour
9 10 11 12 13	Prof. Hunter Lenihan	Fisher Expert. Prof. Hunter Lenihan is Plaintiffs' sole testifying expert on issues of marine biology and will testify regarding the matters in his expert reports, including the harm from oil spills to fisheries generally and the harm caused by Plains' Oil Spill. Estimated time (direct): 2 hours
14 15 16 17 18	Raul Levario	Shift Supervisor, Plains. Mr. Levario will offer testimony regarding events in the control room on the day of the Spill. Mr. Levario was directly supervising Mr. Vaughan in the control room at the day of the Spill and offers unique testimony regarding decisions to disable alarms and re-start the pipeline on the day of the Spill. Estimated time (direct): 0.5 hour
19 20 21 22 23	Ronald Macleod	Representative of Baci Family LLC, Beachfront Property Owner, Subclass Representative. Mr. Macleod is the designated representative of Baci Family LLC, who will testify about the harm caused by Plains' Oil Spill at his family property. Estimated time (direct): 0.5 hour

1	Damien Manuele	SB County Fire, Station 31. Mr. Manuele will testify about his observations on the date of the Spill, including the nature and efficacy of Plains' response and statements made by Plains' employees. Mr. Manuele's testimony is unique because he is one of the few individuals who were personally present in close proximity to the Spill and he witnessed statements by Plains' employees and was personally present for Plains' response efforts both at the Spill site and at Incident Command.
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8		Estimated time (direct): 1 hour
9	Juan Martinez	Construction Manager, Plains. Mr. Martinez will testify that the Integrity Group was primarily responsible for identifying anomalies, analyzing corrosion issues and handing down instructions and authorizations to conduct work.
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12		Estimated time (direct): *
13	Dr. Igor Mezic	Oil Fate and Transport Expert. Dr. Mezic is an expert in modelling physical processes, and whose model demonstrates where Line 901 oil travelled following the Spill.
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15		Estimated time (direct): 4 hours
16	Jim McCall	CDFW Fingerprinting. Mr. McCall, Environmental Scientist for the CDFW in the Office of Spill Prevention and Response, will testify regarding oil sample collection, chain of custody, and fingerprinting analysis. Mr. McCall is the Plaintiffs' only witness from CDFW's Office of Spill Prevention and Response.
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20		Estimated time (direct): 0.5 hour
21	Hwa Hong Muh	Subclass representative. Mr. Muh is a sea cucumber processor and Subclass Representative who will testify about the harm caused by Plains' Oil Spill. Mr. Muh will testify regarding customer concern about Plains' Oil Spill contaminating the regional fishery.
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25		Estimated time (direct): 0.5 hour

1	Daniel Nerbonne	Daniel Nerbonne was the Vice President over Engineering and had responsibility for oversight of Plains' integrity management plan, and will testify regarding oversight and implementation of that plan.
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4		Estimated time (direct): 0.5 hour
5	Dr. Lee Norris	Spill Volume Modeling Expert. Mr. Lee Norris, PhD, will testify that the analysis and model of Plains' Spill volume expert Dr. Zaldivar departs from standard industry practice, including improperly isolating Line 901 from Line 903, which leads to erroneous assumptions regarding the amount of oil that spilled. Mr. Norris is the sole expert who will testify that Plains' expert Zaldivar's spill simulation model is erroneous and, at best, estimates the minimum amount of oil spilled rather than the actual amount.
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12		Estimated time (direct): 2 hours
13	Cptn. Chris Olmstead	SB County Fire Captain. Cptn. Olmstead will testify about his observations on the date of the Spill, including Plains' response and statements of Plains' employees. Mr. Olmstead's testimony is unique because he is one of the few individuals who were personally present in close proximity to the Spill and he witnessed statements by Plains' employees and was personally present for Plains' response efforts both at the Spill site and at Incident Command
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18		Estimated time (direct): *
19	Cptn. Jason Orr	SB County Fire. Cptn. Orr will testify about his observations on the date of the Spill, including the nature and efficacy of Plains' response and statements made by Plains' employees. Orr's testimony is unique because he is one of the few individuals who were personally present in close proximity to the Spill and he witnessed statements by Plains' employees and was personally present for Plains' response efforts both at the Spill site and at Incident Command.
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25		Estimated time (direct): *

1	Darren Palmer	Maintenance Supervisor, Bakersfield District, Plains. Mr. Palmer was the sole maintenance supervisor during the relevant time period and in the relevant region for Plains. Mr. Palmer will testify regarding his knowledge of Line 901 maintenance as the maintenance supervisor for the district that included Line 901 prior to Plains' Oil Spill.
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6		Estimated time (direct): 0.5 hour
7	Harry Pefanis	President and Chief Operating Officer, Plains. Mr. Pefanis will testify regarding Plains' financial condition, its acquisition of Line 901, and Plains' awareness of the risk of an oil spill from Line 901. Mr. Pefanis is the sole senior Plains executive from whom Plaintiffs obtained deposition testimony.
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11		Estimated time (direct): 1 hour
12	Kathleen Randall	Operations Supervisor, Santa Maria Office, Plains. Ms. Randall had supervisory responsibility for Plains' Lines 901 and 903. She was also personally present at the Spill location and immediate response. Ms. Randall will testify regarding Plains' maintenance and spill response procedures relating to Lines 901 and 903 and knowledge of corrosion; she was also on scene at the time of the Oil Spill and has knowledge of local level operations issues.
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18		Estimated time (direct): 2 hours
19	Sarah Rathbone	Subclass Representative. Ms. Rathbone, a Subclass Representative and the owner of processor Community Seafood, will testify about the harm caused by the Plains' Oil Spill. Ms. Rathbone is the sole Subclass Representative owner of a multi-species fish processor and re-seller.
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23		Estimated time (direct): 0.5 hour
24	Prof. Peter Rupert	Expert on Fisher Damages. Prof. Rupert will testify on the subjects in his expert reports, including how a difference-in-differences regression analysis shows class-wide injury and damages to the Fisher Subclass. Prof. Peter Rupert is Plaintiffs' only designated witness on the topics in his expert reports.
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28		Estimated time (direct): 3 hours

1	Bill Sarten	Subcontractor, Pacific Petroleum. Mr. Sarten will testify regarding digs he has performed, including a dig for Plains' pipeline that later ruptured. Mr. Sarten specifically performed a dig on the pipeline.
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4		Estimated time (direct): 0.25 hour
5	John Shelton	Corrosion Manager, Plains. Mr. Shelton was responsible for all aspects of corrosion issues, internal and external. He ordered Mr. Cordova to stop putting comments on corrosion in writing. Mr. Shelton will testify that Plains was aware of increasing external corrosion leading up to 2015 and will testify regarding Plains' integrity management policies and procedures, and the coordination between the Integrity Group and Engineering Group.
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11		Estimated time (direct): 1 hour
12	Michael Stackhouse	Pipeline Integrity Manager, Plains. Mr. Stackhouse invoked his Fifth Amendment right and refused to answer questions about Plains' corrosion management program. Mr. Stackhouse is a former Plains' employee with unique knowledge of Plains' corrosion management program regarding Line 901.
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16		Estimated time (direct): 0.5 hour
17	David Tibbles	Representative of Ocean Angel IV, LLC, Subclass Representative. Mr. Tibbles is the managing member of Subclass Representative, Ocean Angel IV, LLC, and will testify about the harm caused by Plains' Oil Spill.
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20		Estimated time (direct): 0.5 hour
21	Prof. David Valentine Ph.D.	Consultant to Unified Command, Witness to Spill. Prof. Valentine is an international expert on oil spills and has extensive knowledge of regional seeps and oil fingerprinting. Prof. Valentine will provide first-hand fact testimony and his expert opinions regarding Plains' Oil Spill.
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25		Estimated time (direct): 1.5 hours

1	Troy E. Valenzuela	VP, Environmental Health and Safety, Plains. Mr. Valenzuela is Plaintiffs' sole witness from Plains' Environmental Health and Safety department and will testify about Plains' interaction with the regulatory response following Line 901.
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4		Estimated time (direct): 0.5 hour
5	Jon D. Van Reet	Leak Detection Manager, Plains. Mr. Van Reet will offer testimony regarding Plains' leak detection efforts, including worst case discharge estimates and his involvement in estimating Spill volume. As Plains' Leak Detection Manager, Mr. Van Reet has unique experience regarding how Plains detects leaks and decisions impacting how Plains detects leaks.
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10		Estimated time (direct): 1 hour
11	James Vaughan	Pipeline Controller, Plains. Mr. Vaughan, the pipeline controller on the day of the Spill, will testify about his training as a pipeline controller and the events in the control room on the day of the Spill.
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14		Estimated time (direct): 1 hour
15	Alex Vinot	Integrity Specialist, Plains. Mr. Vinot will testify about Plains' lack of adherence to its Integrity Management Plan. Mr. Vinot has unique experience as one of a handful of integrity specialists at Plains during the relevant period.
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18		Estimated time (direct): 0.5 hour
19	William Welch	Senior Director of Pipeline Control and Scheduling, Plains. Mr. Welch will testify regarding alarms, the setting of alarms, and operating pressures. Mr. Welch oversees operations of the control room, including the setting of alarms and pressures in Plains' pipeline system.
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23		Estimated time (direct): 1 hour
24	John Wiley	Aerial Photographer. Mr. Wiley will testify regarding certain aerial photographs he took on the day of the Spill. Mr. Wiley's testimony is unique because he is able to authenticate certain photographs on the date of the Spill and provide personal observations of the extent of the Spill.
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28		Estimated time (direct): 0.5 hour

Wei Hai Zhuang	Wei International Trading, Subclass Representative. Mr. Zhuang is a sea cucumber processor and Subclass Representative who will testify about the harm caused by Plains' Oil Spill to the sea cucumbers he processes, including spoiled product. Estimated time (direct): 0.5 hour
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DEFENDANTS EXPECT TO PRESENT

Witness Name	Description and Time Estimate
Kile Anderson	Mr. Anderson was an employee of Worley Claims Services. Mr. Anderson will provide fact testimony regarding Plains' efforts to compensate individuals affected by the Line 901 release through the OPA process. Estimated time (direct): 1 hour
Joshua Bremner (if available)	Mr. Bremner was a Plains employee in the Integrity Management department prior to and at the time of the Line 901 spill. Mr. Bremner will testify regarding application of Plains' integrity management practices to Line 901. Estimated time (direct): 2.5 hours
Mark Crossland	Mr. Crossland is currently an employee of Plains and was the State On-Scene Commander in the Line 901 Unified Command. Mr. Crossland will provide fact testimony regarding the extent of the response and the cleanup of Line 901 oil. Estimated time (direct): 1.5 hours
Robin Cunningham	Ms. Cunningham is a Plains employee in the Integrity Management department. Ms. Cunningham will testify regarding Plains' integrity management practices and their application to Line 901. Estimated time (direct): 2 hours

1	Stephen Falgoust	Mr. Falgoust is a Plains employee in the Integrity Management department. Mr. Falgoust will testify regarding Plains' integrity management practices and oversight thereof.
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4		Estimated time (direct): 1 hour
5	Ngiabi Gicuhi	Mr. Gicuhi is a Plains employee in the Environmental and Regulatory Compliance Group. Mr. Gicuhi will offer testimony regarding PHMSA's regulation of Line 901.
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7		Estimated time (direct): 3 hours
8	Kyle Hanson	Mr. Hanson was the head of Clean Seas, the lead on-water responder to the Line 901 release. Mr. Hanson will provide fact testimony about the on-water cleanup of Line 901 oil.
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10		Estimated time (direct): 45 minutes
11	Michael Stackhouse (if available)	Mr. Stackhouse was a Plains employee in the Integrity Management department prior to and at the time of the Line 901 spill. Mr. Stackhouse will testify regarding Plains' integrity management practices and oversight thereof.
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14		Estimated time (direct): 3 hours
15	Jon D. Van Reet	Mr. Van Reet is a Plains employee in the Leak Detection group. Mr. Van Reet will provide fact testimony regarding Plains' leak detection practices. Mr. Van Reet will also provide expert testimony regarding Plains' efforts to quantify the amount of oil released from Line 901.
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19		Estimated time (direct): 1 hour
20	William "Billy" Welch	Mr. Welch is a Plains employee in the Control Center and Scheduling group. Mr. Welch will provide fact testimony regarding the operation and oversight of Plains' control room.
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22		Estimated time (direct): 1 hour
23	Zachary Nixon (by designation)	Mr. Nixon is an employee of Research Planning, Inc. Mr. Nixon will testify regarding his processing of SCAT data relied upon by Dr. Mezic and his communications with Dr. Mezic regarding that data.
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27		Estimated time (direct): 2 hours, 15 minutes

1	Dr. Paul Boehm	Dr. Boehm is Defendants' expert on the fate and transport of the Line 901 release. Dr. Boehm will testify regarding the fate and transport of Line 901 oil based on the extensive empirical evidence collected during the response.
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4		Estimated time (direct): 3 hours
5	Dr. Katherine Buckingham	Dr. Buckingham is a principal engineer for DNV GL, the company hired to determine the causes of the spill as part of PHMSA's investigation. Dr. Buckingham will offer expert testimony regarding the failure of Line 901 and its causes.
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8		Estimated time (direct): 3 hours
9	Dr. David Norfleet	Dr. Norfleet is the head of incident investigations for DNV GL, the company hired to determine the causes of the spill as part of PHMSA's investigation. Dr. Norfleet will offer expert testimony regarding the failure of Line 901 and its causes.
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12		Estimated time (direct): 3 hours
13	Dr. Robert Caligiuri	Dr. Caligiuri is Defendants' expert on pipeline integrity management. Dr. Caligiuri will offer testimony regarding Plains' integrity management practices and respond to the opinions of Plaintiffs' expert Dr. Cameron.
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16		Estimated time (direct): 5 hours
17	Christian Carcamo	Mr. Carcamo is an employee of the Rosen Group, the company that conducted in-line inspections on Line 901. Mr. Carcamo will offer expert testimony regarding in-line inspections.
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20		Estimated time (direct): 2.5 hours
21	Michael Fichera	Mr. Fichera is Defendants' expert on the modeling of the fate and transport of the Line 901 release using the COSIM model. Mr. Fichera will testify regarding his model results and correct errors in Plaintiffs' modeling methodologies.
22		
23		
24		Estimated time (direct): 1.5 hours
25	Ronald Hendricks	Mr. Hendricks is Defendants' expert on real estate. Mr. Hendricks will testify regarding the flaws in Dr. Bell's analysis of the effects of the Line 901 release on beachfront properties.
26		
27		Estimated time (direct): 1 hour
28		

1 2 3 4	Dr. Doug MacNair	Dr. MacNair is Defendants' expert regarding beach usage. Dr. MacNair will testify regarding qualitative and quantitative data concerning the use of Santa Barbara, Ventura, and Los Angeles County beaches in the summer of 2015. Estimated time (direct): 2.5 hours
5 6 7 8	Thomas Miesner	Mr. Miesner is Defendants' expert on control room management. Mr. Miesner will testify regarding the standard of care for control room operators and the actions of Plains' control room on the day of the release. Estimated time (direct): 1.5 hours
9 10 11 12 13	Dr. Ann Michelle Morrison	Dr. Morrison is Defendants' expert on fisheries ecology and the effect of Line 901 oil on California fisheries. Dr. Morrison will testify regarding her analysis of the effects of the Line 901 release and rebut Plaintiffs' expert testimony regarding the potential for harm to fisheries from the release. Estimated time (direct): 4 hours
14 15 16 17 18	Bob Perham	Mr. Perham is Defendants' expert regarding the location of properties comprising the Property Subclass. Mr. Perham will testify regarding his mapping of those properties and identification of properties as either mean-high-tide-line properties or non-mean-high-tide-line properties. Estimated time (direct): 1 hour
19 20 21 22	Dr. Edward Owens	Dr. Owens is Defendants' expert on the SCAT process used during the Line 901 and South Bay Incident responses. Dr. Owens will testify regarding the permissible uses and limits of SCAT data and his evaluation of the SCAT process as performed in those two incidents. Estimated time (direct): 1.5 hours
23 24 25 26 27	Dr. Hal Sider	Dr. Sider is Defendants' expert on regression analysis. Dr. Sider will testify regarding the correct methodology for conducting regression analyses regarding the effect of the Line 901 release and correct errors in Plaintiffs' regression analyses. Estimated time (direct): 4 hours

1 2 3 4	Avram Tucker	Mr. Tucker is Defendants' expert on the economic impacts of Line 901 on subclass members. Mr. Tucker will testify regarding the correct methodology for calculating damages and the appropriate damages figures. Estimated time (direct): 4 hours
5 6 7 8 9	Dr. Michael Zaldivar	Dr. Zaldivar is Defendants' expert on the modeling of the volume of oil released from Line 901. Dr. Zaldivar will testify regarding his model's conclusions regarding the amount of oil released from Line 901 and correct errors in Plaintiffs' experts' theories that more oil could have been released. Estimated time (direct): 2 hours

DEFENDANTS MAY CALL IF NEED ARISES

12	Witness Name	Description and Time Estimate
13 14 15	Greg Armstrong* ¹	Mr. Armstrong is co-founder and former CEO of Plains. Mr. Armstrong would testify regarding leadership of Plains and its response to the Line 901 spill.
16 17 18	Wade Bryant*	Mr. Bryant is an employee of CK Associates. Mr. Bryant would provide fact testimony regarding the Line 901 SCAT process and the efforts undertaken to remove Line 901 oil from the environment.
19 20 21	Mike Buttram*	Mr. Buttram is a construction supervisor for Plains. Mr. Buttram would provide fact testimony regarding the discovery of the Line 901 release.
22 23 24	Henry Cordova*	Mr. Cordova is a Plains employee in the corrosion department. Mr. Cordova would testify regarding Plains' cathodic protection practices and readings for Line 901.

¹ "*" indicates a witness will be called only if necessary.

1	Eric Each*	Mr. Each is a Plains employee in the Control Center and Scheduling group. Mr. Each would provide fact testimony regarding the operations of Plains' control room.
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3		
4	Jesus Gonzalez*	Mr. Gonzalez is an employee of the Rosen Group, the company that conducted in-line inspections on Line 901. Mr. Gonzalez would testify regarding analysis of inspection results for Line 901.
5		
6		
7	Mark Gorman*	Mr. Gorman was Plains' Executive Vice President of Operations and Engineering prior to and at the time of the Line 901 spill. Mr. Gorman would testify regarding oversight of Plains' operations and engineering practices.
8		
9		
10		
11	Charles "Skip" Hammond*	Mr. Hammond is an electrical technician employed by Plains. Mr. Hammond would provide fact testimony regarding the operation and maintenance of Line 901 on May 19, 2015.
12		
13	Richard Hartig*	Mr. Hartig is a Plains employee in the Operations group. Mr. Hartig would testify regarding Plains' Operations group practices and digs and repairs on Line 901.
14		
15		
16	Patrick Hodgins*	Mr. Hodgins is a Plains employee who served as Plains' On-Scene Commander in the Line 901 Unified Command. Mr. Hodgins would provide fact testimony regarding the response, the cleanup of Line 901 oil, and other efforts undertaken by Plains to remediate the release.
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20	Dan Nerbonne (by designation)*	Mr. Nerbonne (deceased) was Plains' Vice President of Engineering. His testimony would address oversight of Plains' Integrity Management department.
21		
22		
23	Darren Palmer*	Mr. Palmer is a Plains employee in the Operations group. Mr. Palmer would testify regarding oversight of digs and repairs on Line 901.
24		
25		
26	Harry Pefanis*	Mr. Pefanis is co-founder and President of Plains. Mr. Pefanis would testify regarding leadership of Plains and its response to the Line 901 spill.
27		
28		

1	Bill Sarten*	Mr. Sarten is a subcontractor of Pacific Petroleum. Mr. Sarten would testify regarding conducting digs and repairs on Line 901.
2		
3		
4	Troy Valenzuela*	Mr. Valenzuela is a Plains employee in the Environmental and Regulatory Compliance group. Mr. Valenzuela would testify regarding Plains' environmental and regulatory compliance group practices.
5		
6		
7	Hal Ozanne*	Mr. Ozanne is Defendants' expert on automatic shutoff valves. Mr. Ozanne would testify regarding the use of automatic shutoff valves in liquid pipelines and the effect such a valve would have had on the release.
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9		
10	Dr. Nancy Mathiowetz*	Dr. Mathiowetz is Defendants' expert on surveys. Dr. Mathiowetz would testify regarding the flaws in the surveys conducted by Dr. Bell's team and why those surveys are unreliable.
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12		
13	Keith and Tiffani Andrews*	Mr. and Mrs. Andrews are named representatives of the fish industry subclass. Plains would call Mr. and Mrs. Andrews to testify regarding the injury they allegedly suffered as a result of the Line 901 release.
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16		
17	Morgan Castagnola*	Mr. Castagnola is a named representative of the fish industry subclass. Plains would call Mr. Castagnola to testify regarding the injury he allegedly suffered as a result of the Line 901 release.
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19		
20	Mike Gandall*	Mr. Gandall is a named representative of the fish industry subclass. Plains would call Mr. Gandall to testify regarding the injury he allegedly suffered as a result of the Line 901 release.
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22		
23	Hwa Hong Muh*	Mr. Muh is a named representative of the fish industry subclass. Plains would call Mr. Muh to testify regarding the injury he allegedly suffered as a result of the Line 901 release.
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26	David Tibbles (Ocean Angel IV)*	Mr. Tibbles represents a named representative of the fish industry subclass. Plains would call Mr. Tibbles to testify regarding the injury his business allegedly suffered as a result of the Line 901 release.
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28		

1	John Guglielmo	Mr. Guglielmo represents a named representative of the fish
2	(Pacific Rim/So	industry subclass. Plains would call Mr. Guglielmo to testify
3	Cal Seafood)*	regarding the injury his businesses allegedly suffered as a result
4		of the Line 901 release.
5	Sarah Rathbone	Ms. Rathbone represents a named representative of the fish
6	(Community	industry subclass. Plains would call Ms. Rathbone to testify
7	Seafood)*	regarding the injury her business allegedly suffered as a result
8		of the Line 901 release.
9	Arnulfo Baez	Mr. Baez represents a named representative of the fish industry
10	(Santa Barbara	subclass. Plains would call Mr. Baez to testify regarding the
11	Uni)*	injury his business allegedly suffered as a result of the Line
12		901 release.
13	Weihai “Danny”	Mr. Zhuang represents a named representative of the fish
14	Zhuang (Wei	industry subclass. Plains would call Mr. Zhuang to testify
15	International	regarding the injury his business allegedly suffered as a result
16	Trading)*	of the Line 901 release.
17		
18	Dinhvu Nguyen,	The Nguyen family represents a named representative of the
19	Hoa Nguyen, and	fish industry subclass. Plains would call the Nguyens to testify
20	Thuy Ngyuen	regarding the injury their business allegedly suffered as a result
21	(Eagle Fleet)*	of the Line 901 release.
22		
23	Unnamed Fish	Plains would call unnamed fish industry subclass members to
24	Industry Subclass	testify regarding their individualized injuries allegedly suffered
25	Members (listed	as a result of the Line 901 release.
26	in Dkt. 766-1, the	
27	under-seal	
28	Exhibit A to Joint	
	Witness List)*	
	Alex Geremia*	Ms. Geremia is a named representative of the property
		subclass. Plains would call Ms. Geremia to testify regarding
		the injury she allegedly suffered as a result of the Line 901
		release.

1	Mary Kirkhart*	Mrs. Kirkhart is a named representative of the property subclass. Plains would call Mrs. Kirkhart to testify regarding the injury she allegedly suffered as a result of the Line 901 release.
2		
3		
4	Ronald Macleod	Mr. Macleod represents a named representative of the property subclass. Plains would call Mr. Macleod to testify regarding the injury the property owned by Baciú Family LLC allegedly suffered as a result of the Line 901 release.
5	(Baciú Family LLC)*	
6		
7	Jacques Habra*	Mr. Habra is a named representative of the property subclass. Plains would call Mr. Habra to testify regarding the injury he allegedly suffered as a result of the Line 901 release.
8		
9		
10	Unnamed	Plains would call unnamed property subclass members to testify regarding their individualized injuries allegedly suffered as a result of the Line 901 release.
11	Property Subclass	
12	Members	
13	(properties listed in Dkt. 766-1, the under-seal Exhibit A to Joint Witness List)*	
14		
15		
16	Custodian of	Plains would call a custodian of records to authenticate aerial photographs of beaches received from Apollo Mapping.
17	Records	
18	(Apollo)*	
19	Custodian of	Plains would call a custodian of records to authenticate photographs of beaches received from Alamy Ltd.
20	Records	
21	(Alamy)*	
22	Custodian of	Plains would call a custodian of records from the California Department of Fish and Wildlife (“CDFW”) to authenticate business records received from the CDFW.
23	Records	
24	(CDFW)*	
25	Photographers	Plains would call photographers that contributed photographs of beaches to the Alamy website.
26	(Alamy)*	

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1 DATED: March 17, 2021

MUNGER, TOLLES & OLSON LLP

2
3 By: /s/ Henry Weissmann

HENRY WEISSMANN

4 Attorney for Defendants PLAINS ALL
5 AMERICAN PIPELINE, L.P. and PLAINS
6 PIPELINE, L.P.

7 DATED: March 17, 2021

Respectfully submitted,

8 /s/ Robert J. Nelson

Robert L. Lieff (CSB No. 037568)

9 Elizabeth J. Cabraser (CSB No. 083151)

10 Robert J. Nelson (CSB No. 132797)

Nimish Desai (CSB No. 244953)

11 Wilson M. Dunlavey (CSB No. 307719)

12 Jacob H. Polin (CSB No. 311203)

Lieff Cabraser

13 Heimann & Bernstein, LLP

14 275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

15 Telephone: (415) 956.1000

16 Facsimile: (415) 956.1008

17 *Class Counsel*

18 Juli E. Farris (CSB No. 141716)

19 Matthew J. Preusch (CSB No. 298144)

20 Alison Chase (CSB No. 226976)

KELLER ROHRBACK L.L.P.

21 801 Garden Street, Suite 301

Santa Barbara, CA 93101

22 Telephone: (805) 456-1496

23 Facsimile: (805) 456-1497

1 Lynn Lincoln Sarko
2 (Admitted Pro Hac Vice)
3 Gretchen Freeman Cappio
4 (Admitted Pro Hac Vice)
5 Michael D. Woerner
6 (Admitted Pro Hac Vice)
7 Raymond Farrow
8 (Admitted Pro Hac Vice)
9 Daniel Mensher
10 (Admitted Pro Hac Vice)
11 Laura R. Gerber
12 (Admitted Pro Hac Vice)
13 KELLER ROHRBACK L.L.P.
14 1201 Third Ave, Suite 3200
15 Seattle, WA 98101
16 Telephone: (206) 623-1900
17 Facsimile: (206) 623-3384

12 A. Barry Cappello (CSB No. 037835)
13 Leila J. Noël (CSB No. 114307)
14 Lawrence J. Conlan (CSB No. 221350)
15 David L. Cousineau (CSB No. 298801)
16 CAPPELLO & NOËL LLP
17 831 State Street
18 Santa Barbara, CA 93101-3227
19 Telephone: (805) 564-2444
20 Facsimile: (805) 965-5950

21 *Lead Trial Counsel*

19 William M. Audet (CSB No. 117456)
20 Ling Y. Kuang (CSB No. 296873)
21 AUDET & PARTNERS, LLP
22 711 Van Ness Avenue
23 Suite 500
24 San Francisco, CA 94102
25 Telephone: (415) 568-2555
26 Facsimile: (415) 568-2556

27 *Class Counsel*